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September 21, 1993

Ronald R. Day Vice President Rancho Equipment Services P.O. Box 591 279 East Main Delta, Utah 84624

Re:

Review of Notice of Intention to Conduct Large Mining Operations, Rancho Equipment Service (Rancho), Topaz Limestone Quarry, M/023/022, Juab County, Utah

Dear Mr. Day:

The Division has completed its review of your Plan of Operations as submitted to the Bureau of Land Management (BLM) and the Draft BLM Environmental Assessment (EA) prepared for your project. These submissions will in effect, change the Small Mining Operation Notice of Intent (DOGM file #: S/023/022) into a Large Mining Operation (new file #: M/023/022). Previous Division correspondence incorrectly referred to file number M/023/026. The BLM case file number is UT-054-92-01P.

Due to a backlog of permitting reviews and the necessity of seasonal field work we were not able to complete our review sooner. We offer our apology for this added delay.

After reviewing the information provided, the Division has several comments and questions which will need to be addressed. These comments are listed below under the applicable Minerals Rule heading. Please respond to each comment/question and format your response according to the referenced rule.



Page 2 Mr. Ronald R. Day M/023/022 September 21, 1993

### R647-4-106 Operation Plan

The Division is under the impression that Rancho will implement/comply with all the mitigating measures identified by the BLM in their EA for this Plan of Operations. Please confirm/clarify this. (AAG)

## 106.3 Estimated acreages disturbed, reclaimed, annually?

Rancho has not described any concurrent reclamation practices in their mine plan. The Division would encourage contemporaneous reclamation whenever possible. (AAG)

## 106.4 Nature of materials mined, waste & estimated tonnages

Please provide an estimate of the amount of fines which will be available for placement over the regraded quarry at the time of final reclamation. The amount of fines will influence the reclamation cost estimate as well as the revegetation treatments and revegetation success. (AAG)

#### 106.5 Existing soil types, location, amount

Please provide an estimate of the volume of topsoil available for use at final reclamation. This amount will influence the reclamation cost estimate, revegetation treatments and revegetation success. Also, please indicate the approximate depth of material which will be scraped from the surface during the topsoil salvaging operation. (AAG & HWS)

### 106.6 Plan for protecting & redepositing soils

Please identify all topsoil stockpiles onsite with signs and stabilize the stockpiles by reseeding them during the operational phase of mining. (HWS)

# 106.9 Location & size of ore, waste, tailings, ponds

Please provide particle size and particle proportion descriptions for the waste fines (for example: 30% of -10 inch and 70% of -3 inch). (AAG)

Page 3 Mr. Ronald R. Day M/023/022 September 21, 1993

### R647-4-107 Operation Practices

## 107.1.15 Constructing berms, fences, etc. above highwalls

Rancho has agreed to construct barriers above highwalls & excavations according to item (3) of the BLM's Mitigating Measures. Since Rancho has also agreed to eliminate any highwalls at the time of final reclamation, (item 1 of the BLM's mitigating measures) we assume that the highwall barriers will be implemented only during mining operations. Please confirm/clarify this. (AAG)

#### R647-4-110 Reclamation Plan

## 110.2 Roads, highwall, slopes, drainages, pits, etc. reclaimed

According to item (1) of the BLM Mitigating Measures, any highwalls remaining at the time of final reclamation will be regraded by Rancho to 3h:1v, therefore, no barriers will be needed at final reclamation to restrict public access for safety reasons. Please confirm/clarify this. (AAG)

## 110.5 Revegetation planting program

Rancho should apply fertilizer and mulch at the time of reclamation. The Division recommends broadcasting the fertilizer at the time of seeding at a rate of 200 lbs/acre of diammonium phosphate. We also recommend applying hay mulch at a rate of 2,000 lbs/acre. (AAG & HWS)

#### R647-4-111 Reclamation Practices

### 111.13 Plugging drill holes

According to item (10) of the BLM Mitigating Measures, all drill holes which were not mined through by the time of final reclamation will be plugged according to Division rules. Please confirm/clarify this. (AAG)

#### **R647-4-112** Variance

No variances have been requested by Rancho.

Page 4 Mr. Ronald R. Day M/023/022 September 21, 1993

## R647-4-113 Surety

A draft reclamation surety estimate (8/22/92) was prepared and forwarded to Rancho. The draft estimate will need to be revised after the information requested in this letter has been received by the Division. A copy of this draft estimate is attached. For your information, the Division's escalation factor is currently 1.42%. (AAG)

### R647-4-116 Public Notice & Appeals

Once the issues described in this letter have been resolved, the Division will be ready to issue tentative approval for Rancho's Large Mining Operation. At that time, the Division will prepare and publish a public notice. This will start a 30-day public comment period. At the end of the public comment period and/or after the resolution of any public concerns, the Division will seek concurrence/approval from the Board of Oil, Gas and Mining on the amount and form of Reclamation Surety. We will need a completed Reclamation Contract and Surety form in order to present the matter to the Board of Oil, Gas and Mining for approval.

Thank you for your cooperation in completing this permitting action. Please contact me, Holland Shepherd or Tony Gallegos, if you have any questions regarding the requirements as outlined in this review letter.

Sincerely,

D. Wayne Hedberg Permit Supervisor

Minerals Regulatory Program

jb

Attachment

cc: Rody Cox, BLM House Range R.A.

Lowell Braxton, DOGM

M023022.rev

RECLAMATION ESTIMATE	DRAFT	
Rancho Equipment Services		( (
Topaz Limestone Quarry S/023/022 => M/023/026	last revision	08/22/92
S/023/022 => M/023/026	Juab County	
Prepared by Utah State Division of Oi	I, Gas & Mining	
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#### Reclamation Details

- -Small mining operation converting to large mining operation
- -All structures & equipment to be removed from the mine site
- -All pads & new roads to be ripped to 6"depth, disked & seeded
- -All trash & debris removed from site
- -Quarry benches/highwalls blasted or regraded to 3h:1v
- -ASSUME 2/3 quarry area has a highwall at reclamation
- -Quarry area regraded to approximate original contours ???
- -Limestone waste/fines spread over regraded quarry (6" depth?)
- -Salvaged topsoil spread over entire disturbed area (6" depth?)
- -Entire disturbed area disked & seeded (drill or broadcast)
- -All drillholes not mined will be plugged according to DOGM rules
- -Topsoil stockpile areas to be disked & seeded

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-Estimated total disturbed acreage =	=		15.8	acre	
Activity	Amount		\$/unit		\$
Regrade 2/3 quarry to 3:1	4.8	acre	488		2,342
Place 6" fines over quarry - 6"?	7.2	acre	250		1,800
Rip stockpile pads & roads	6.6	acre	485		3,201
Place topsoil(6" ?)	15	acre	210		3,150
Disk & seed - MULCH? FERHLIZE?	15.8	acre	280		4,424
Remove trash & debris	15.8	acre	100		1,580
Plug drill holes	1	sum	1000		1,000
Remove highwall berms	800	LF	4		3,200
Remove culverts	5	each	100		500
Mobilization	6	equip	1000		6,000
WODINZACO.					
Add 10% conting		Subtotal			27,197
		encv			2,720
,			Subtotal		29,917
Add 5 yr escalation at 1.27%			4,263		
/Ida	, y. 000a.a	Total 19			34,180
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Roun	ded Total in	1997-\$		\$	34,200
		\$2,165			•
Average cost per acre =		Ţ.,			



